

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:18-CR-326-D

UNITED STATES OF AMERICA

v.

DANIEL ROMANOWSKI

MOTION TO CONTINUE  
ARRAIGNMENT

The defendant, DANIEL ROMANOWSKI, by and through undersigned counsel, hereby moves the Court to the arraignment in the above-captioned case for thirty (30) days. In support of this Motion, Mr. Romanowski states the following:

- (1) In a one count indictment, the grand jury has charged Mr. Romanowski with voting by a non-citizen. 18 U.S.C. § 611(a).
- (2) This Court has set Mr. Romanowski's arraignment for Tuesday, October 23, 2018.
- (3) The parties anticipate that this matter will ultimately be resolved by a plea.
- (4) Mr. Romanowski's criminal case has required undersigned counsel to familiarize himself with various aspects of federal immigration law, a subject area outside his normal range of practice.
- (5) Counsel wishes to resolve several immigration-related issues so that he may discuss with Mr. Romanowski the possible impact of this criminal case upon Mr. Romanowski's immigration status.
- (6) Additionally, Mr. Romanowski recently has undergone a hospitalization. Because of this, counsel has not yet been able to meet with him to prepare for the arraignment hearing.
- (7) For these reasons, Mr. Romanowski respectfully requests that the Court continue the arraignment to its November 2018 term of court.

(8) Undersigned counsel has discussed this motion with Assistant United States Attorney Sebastian Kielmonovich, and the government has no objection to the relief requested herein.

(9) This motion is made in good faith and not for the purpose of delay. Neither the government nor the Defendant would be prejudiced by the continuance sought herein.

WHEREFORE, Mr. Romanowski respectfully requests that arraignment be continued to the November 2018 term of court. The ends of justice served by granting this Motion outweigh the interests of the public and the Defendant in a speedy trial as set forth in 18 U.S.C. § 3161(h)(7)(A).

Respectfully requested this 15th day of October, 2018.

G. ALAN DuBOIS  
Federal Public Defender

/s/ Stephen C. Gordon  
STEPHEN C. GORDON  
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N.C. State Bar No. 15873  
LR 57.1 Counsel  
Appointed

*CERTIFICATE OF SERVICE*

I HEREBY CERTIFY that a copy of the foregoing was served upon:

SEBASTIAN KIELMANOVICH  
Assistant United States Attorney  
Suite 800, Federal Building  
310 New Bern Avenue  
Raleigh, NC 27601-1461

by electronically filing the foregoing with the Clerk of Court on October 15, 2018, using the CM/ECF system which will send notification of such filing to the above.

This the 15th day of October, 2018.

/s/ Stephen C. Gordon  
STEPHEN C. GORDON  
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Appointed